



3621 01 MAR 16 A7:16

FEB 22 2001

Mr. James A. Grant  
Regulatory Compliance Officer  
Gaia Herbs  
108 Island Ford Road  
Brevard, North Carolina 28712

Dear Mr. Grant:

This is in response to your letter of February 6, 2001 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Gaia Herbs is making the following claims, among others, for the following products:

**Infla-Profen**

“For Ultimate Relief of Back Pain & Inflammation”

**Migra-Profen**

“For Ultimate Relief of Headache Pain & Cramps”

**Nettle Leaf**

“For Ultimate Relief of Allergy Symptoms.”

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for these products, including the name of the product “Migra-Profen,” suggests that they are intended to treat, prevent, cure or mitigate diseases, namely inflammatory back conditions, migraines, and allergies. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA’s Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

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Page 2 - Mr. James A. Grant

Please contact us if we may be of further assistance.

Sincerely,

John B. Foret  
Director  
Division of Compliance and Enforcement  
Office of Nutritional Products, Labeling  
and Dietary Supplements  
Center for Food Safety  
and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300  
FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of  
Enforcement, HFC-200  
FDA, Atlanta District Office, Office of Compliance, HFR-SE140

cc:

HFA-224 (w/incoming)  
HFA-305 (docket 97S-0163)  
HFS-22 (CCO)  
HFS-800 (r/f, file)  
HFS-810  
HFS-811 (file)  
HFD-310  
HFD-314 (Aronson)  
HFS-605  
HFV-228 (Benz)  
GCF-1 (Nickerson)  
f/t:HFS-811:rjm:2/16/01:docname:74477.adv:disc54

**GAIA**  **HERBS**

*Manufacturers of Fresh Botanical Extracts*

FEB 13 2001

Division of Compliance and Enforcement/ONPLDS  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
HFS-810  
200 C Street, SW  
Washington, DC 20204

74477

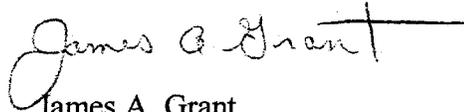
February 6, 2001

Dear Sir:

This letter is to provide notification, within the prescribed 30 days of marketing, of a new product line that contains structure function claims. The line is composed of 34 Liquid Phyto-Caps that are herbal dietary supplements. I have attached a list of these products to include a group of trial size versions of these products. I have also attached a copy of each label that contains the structure function claim as pointed out in the "label example".

Please call at 828-883-5938 if you need addition information or if you have any questions.

Sincerely,



James A. Grant  
Regulatory Compliance Officer

**SUGGESTED USE:**

Take 1 capsule with a small amount of warm water 2 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** – Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

\*THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.



EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**HEP C**  
with  
**Astragalus and Maitake**

For  
**Deep Liver Support\***

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
Calories 14	
ALCOHOL FREE CONCENTRATED EXTRACTS OF:	
Astragalus root ( <i>Astragalus membranaceus</i> )	200 mg†
Chinese Skullcap root ( <i>Scutellaria baicalensis</i> )	100 mg†
Chinese Bupleurum root ( <i>Bupleurum falcatum</i> )	60 mg†
Reishi mushroom ( <i>Ganoderma lucidum</i> )	30 mg†
Maitake mushroom ( <i>Grifola frondosa</i> )	20 mg†
Licorice root ( <i>Glycyrrhiza glabra</i> )	20 mg†

†Daily Value not established.  
Other ingredients: Vegetable glycerin, vegetable gelatin (capsule).  
● = Untreated Chinese Origin  
Each 2 capsules contain 3,000 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot # Best by: Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712 www.gaiaherbs.com

**SUGGESTED USE:**

Take 2 capsules with a small amount of warm water 2-3 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** – Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

**ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC**

\*THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.



EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**INFLA-PROFEN**

For Ultimate Relief of  
**Back Pain & Inflammation\***

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
Calories 14	
ALCOHOL FREE CONCENTRATED EXTRACTS OF:	
Devil's Claw root ( <i>Harpagophytum procumbens</i> )	300 mg†
Feverfew tops ( <i>Chrysanthemum parthenium</i> )	200 mg†
Turmeric rhizome ( <i>Curcuma longa</i> )	100 mg†
Yucca root ( <i>Yucca spp.</i> )	46 mg†
Burdock root & seed ( <i>Arcium lappa</i> )	32 mg†
Celery seed ( <i>Apium graveolens</i> )	16 mg†
Jamaican Deswood bark ( <i>Piscidia erythrina</i> )	12 mg†
Nettle leaf ( <i>Urtica dioica</i> )	10 mg†
Ginger rhizome, Supercritical CO <sub>2</sub> Extract ( <i>Zingiber off.</i> )	8 mg†

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE  
Bioactivity Per 2 Capsules mg Activity  
95% Curcumin (from Turmeric) 95 mg†  
0.5% Parthenolide (from Feverfew) 1.0 mg†  
†Daily Value not established.  
Other ingredients: Vegetable glycerin, lecithin, vegetable gelatin (capsule).  
▲ = Certified Organic ● = Ecologically Wildcrafted  
Each 2 capsules contain 3,800 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot # Best by: Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712 www.gaiaherbs.com

**SUGGESTED USE:**

Take 1 capsule with a small amount of warm water 3 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** – Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

**ECOLOGICALLY WILDCRAFTED (Boroku variety from Vanuatu)**

\*THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.



EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**KAVA KAVA**

Ultimate Support for  
**Relaxation\***

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 3 Capsules	mg
Calories 6	
ALCOHOL FREE CONCENTRATED EXTRACT OF:	
Kava Kava rhizome ( <i>Piper methysticum</i> )	408 mg†

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE  
Bioactivity Per 3 Capsules mg Activity  
55% Total Kavalactones (from Kava Kava) 225 mg†  
†Daily Value not established.  
Other ingredients: Lecithin, vegetable glycerin, vegetable gelatin (capsule).  
● = Ecologically Wildcrafted  
Each 3 capsules contain 3,750 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot # Best by: Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712 www.gaiaherbs.com

**SUGGESTED USE:**

Take 1 capsule with a small amount of warm water 2 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** – Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

**ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**LIVER HEALTH**

For Ultimate Support of  
**Healthy Liver Function\***

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
Calories 14	
ALCOHOL FREE CONCENTRATED EXTRACTS OF:	
Milk Thistle seed ( <i>Silybum marianum</i> )	100 mg†
Turmeric rhizome ( <i>Curcuma longa</i> )	100 mg†
Schizandra berry ( <i>Schizandra chinensis</i> )	100 mg†
MSM (Methylsulfonylmethane)	100 mg†
Ch. Skullcap root ( <i>Scutellaria baicalensis</i> )	56 mg†
Licorice root ( <i>Glycyrrhiza glabra</i> )	20 mg†

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE  
Bioactivity Per 2 Capsules mg Activity  
80% Silymarins (from Milk Thistle) 80 mg†  
95% Curcumin (from Turmeric) 95 mg†  
†Daily Value not established.  
Other ingredients: Vegetable glycerin, lecithin, vegetable gelatin (capsule).  
▲ = Certified Organic ● = Ecologically Wildcrafted  
◆ = Untreated Chinese Origin  
Each 2 capsules contain 5,000 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot # Best by: Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712 www.gaiaherbs.com

**SUGGESTED USE:**  
Take 1 capsule with a small amount of warm water 2 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** - Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

**ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**LOMATIUM OSHA SUPREME**

Ultimate Support for  
Healthy Upper Respiratory Function\*

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
<b>Calories 14</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACTS OF:</b>	
Garlic bulb ( <i>Allium sativum</i> ) ▲	40 mg†
Osha root ( <i>Ligusticum porteri</i> ) ●	34 mg†
Lomatium root ( <i>Lomatium dissectum</i> ) ●	30 mg†
Grindelia floral bud ( <i>Grindelia robusta</i> ) ●	22 mg†
Irish Moss ( <i>Chondrus crispus</i> ) ●	20 mg†
Hyssop leaves ( <i>Hyssopus off.</i> ) ▲	10 mg†
Samberry root ( <i>Berberis vulgaris</i> ) ●	8 mg†
Oregon Grape root ( <i>Berberis aquifolium</i> ) ●	8 mg†
Goldenseal root ( <i>Hydrastis canadensis</i> ) ▲	8 mg†
Mullein leaf ( <i>Verbascum thapsus</i> ) ▲	8 mg†
Lobelia herb & seed ( <i>Lobelia inflata</i> ) ▲	6 mg†
St. John's Wort flower bud ( <i>Hypericum perforatum</i> ) ▲	6 mg†
Echinacea purpurea root ▲	4 mg†
Echinacea purpurea flowering top ▲	4 mg†
Echinacea angustifolia root ▲	3 mg†
Echinacea purpurea seed ▲	0.7 mg†
†Daily Value not established.	

Other ingredients: Vegetable glycerin, vegetable gelatin (capsule).  
▲ = Certified Organic ● = Ecologically Wildcrafted  
Each 2 capsules contain 1,200 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot #  
Best by:

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
www.gaiaherbs.com

**SUGGESTED USE:**  
Take 1 capsule with a small amount of warm water 3 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** - Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

**ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**MALE LIBIDO with Maca Root and Yohimbe**

For Ultimate Enhancement of  
Male Stamina & Performance\*

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 3 Capsules	mg
<b>Calories 21</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACTS OF:</b>	
Maca tuber ( <i>Lepidium meyenii</i> ) ●	120 mg†
Horny Goat Weed ( <i>Epimedium grandiflorum</i> ) ●	54 mg†
Saw Palmetto, Supercritical CO <sub>2</sub> Extract ( <i>Serenoa repens</i> ) ●	54 mg†
Tribulus bark ( <i>Tribulus terrestris</i> ) ●	45 mg†
Yohimbe bark ( <i>Corynanthe yohimbe</i> ) ●	30 mg†
Sarsaparilla root ( <i>Smilax off. v. ornata</i> ) ●	24 mg†
Muir puama root ( <i>Psychopetalum alacoides</i> ) ●	15 mg†
Fo Ti root ( <i>Polygonum multiflorum</i> ) ◆	15 mg†
Wild Oats milky seed ( <i>Avena sativa</i> ) ▲	15 mg†
†Daily Value not established.	

Other ingredients: Vegetable glycerin, vegetable gelatin (capsule).  
▲ = Certified Organic ● = Ecologically Wildcrafted  
◆ = Untreated Chinese Origin

Each 3 capsules contain 2,700 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot #  
Best by:

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
www.gaiaherbs.com

**SUGGESTED USE:**  
Take 2 capsules with a small amount of warm water at the onset of pain and repeat 2-3 times at 15 minute intervals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** - Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

**ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**MIGRA-PROFEN with Phospholipase A2 and COX-2 Inhibitors**

For Ultimate Relief of  
Headache Pain & Cramps

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
<b>Calories 14</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACTS OF:</b>	
Feverfew leaf ( <i>Tanacetum parthenium</i> ) ▲	240 mg†
Ch. Skullcap root ( <i>Scutellaria latifolia</i> ) ◆	110 mg†
Kava Kava ( <i>Piper methysticum</i> ) ●	70 mg†
Valerian root ( <i>Valeriana officinalis</i> ) ▲	30 mg†
Jamaican Dogwood bark ( <i>Piscidia erythrina</i> ) ●	20 mg†
Rosemary leaf, Supercritical Extr. ( <i>Rosmarinus off.</i> ) ●	8 mg†
Ginger rhizome, Supercritical CO <sub>2</sub> Extract ( <i>Zingiber off.</i> ) ●	8 mg†
<b>STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE</b>	
Bioactivity Per 2 Capsules	mg Activity
55% Kavaolactones (from Kava Kava)	38.5 mg†
0.5% Parthenolide (from Feverfew)	1.2 mg†
†Daily Value not established.	

Other ingredients: Vegetable glycerin, vegetable gelatin (capsule).  
▲ = Certified Organic ● = Ecologically Wildcrafted  
◆ = Untreated Chinese Origin

Each 3 capsules contain 5,000 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot #  
Best by:

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
www.gaiaherbs.com

**SUGGESTED USE:**  
Take 1 capsule with a small amount of warm water 2 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** - Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

**ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**MILK THISTLE SEED**

Ultimate Support for  
Healthy Liver Function\*

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
<b>Calories 4</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACT OF:</b>	
Milk Thistle seed ( <i>Silybum marianum</i> ) ●/▲	300 mg†
<b>STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE</b>	
Bioactivity Per 2 Capsules	mg Activity
80% Silymarins (from Milk Thistle)	240 mg†
†Daily Value not established.	

Other ingredients: Lecithin, vegetable glycerin, vegetable gelatin (capsule).  
▲ = Certified Organic ● = Ecologically Wildcrafted

Each 2 capsules contain 9,000 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot #  
Best by:

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
www.gaiaherbs.com

**SUGGESTED USE:**  
 Take 1 capsule with a small amount of warm water 2 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** - Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.  
**CERTIFIED ORGANIC**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**NETTLE LEAF**  
**CERTIFIED ORGANIC**

For Ultimate Relief of  
**Allergy Symptoms\***

100% VEGETARIAN  
 60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
Calories 14	
ALCOHOL FREE CONCENTRATED EXTRACT OF:	
Nettle leaf ( <i>Urtica dioica</i> ) ▲	100 mg†
STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE	
Bioactivity Per 2 Capsules	mg Activity
1% Caffeic acid derivatives (from Nettle)	1.0 mg†
†Daily Value not established.	

Other ingredients: Vegetable glycerin, vegetable gelatin (capsule).  
 ▲ = Certified Organic

Each 2 capsules contain 4,000 mg crude herb equivalent.  
 Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot #  
 Best by

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
 www.gaiaherbs.com

**SUGGESTED USE:**  
 Take 1 capsule with a small amount of warm water 2 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** - Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.  
**ECOLOGICALLY WILDCRAFTED**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**OIL OF OREGANO**

Supercritical CO<sub>2</sub>  
 Extract of Oregano

100% VEGETARIAN  
 60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
Calories 14	
ALCOHOL FREE CONCENTRATED EXTRACT OF:	
Oregano leaf, Supercritical CO <sub>2</sub> Extract ( <i>Origanum vulgare</i> ) ●	400 mg†
†Daily Value not established.	

Other ingredients: Lecithin, vegetable gelatin (capsule).  
 ● = Ecologically Wildcrafted

Each 2 capsules contain 4,000 mg crude herb equivalent.  
 Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot #  
 Best by

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
 www.gaiaherbs.com

**SUGGESTED USE:**  
 Take 1 capsule with a small amount of warm water 2 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

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**ECOLOGICALLY WILDCRAFTED**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**OLIVE LEAF**

Support for  
**Healthy Immune Function\***

100% VEGETARIAN  
 60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
Calories 14	
ALCOHOL FREE CONCENTRATED EXTRACT OF:	
Olive leaf ( <i>Olea europaea</i> ) ●	500 mg†
STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE	
Bioactivity Per 2 Capsules	mg Activity
10% Oleuropeins	50 mg†
†Daily Value not established.	

Other ingredients: Vegetable glycerin, lecithin, vegetable gelatin (capsule).

● = Ecologically Wildcrafted

Each 2 capsules contain 3,200 mg crude herb equivalent.  
 Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot #  
 Best by

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
 www.gaiaherbs.com

**SUGGESTED USE:**  
 Take 1 capsule with a small amount of warm water 3 times daily between meals. *Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.*

**LIQUID PHYTO-CAPS™** - Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.  
**ECOLOGICALLY WILDCRAFTED**  
**CERTIFIED ORGANIC**

\*THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.



EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps™**

**PHYTO-ESTROGEN**

Support for the  
**Peri-Menopause and Menopausal Years\***

100% VEGETARIAN  
 60 LIQUID-FILLED CAPSULES

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 3 Capsules	mg
Calories 21	
ALCOHOL FREE CONCENTRATED EXTRACTS OF:	
Alfalfa leaf ( <i>Medicago sativa</i> ) ●	300 mg†
Vitex berry ( <i>Vitex agnus-castus</i> ) ●	30 mg†
Black Cohosh rhizome ( <i>Cimicifuga racemosa</i> ) ●	27 mg†
Red Clover blossoms ( <i>Trifolium pratense</i> ) ▲	21 mg†
Wild Oats milky seed ( <i>Avena sativa</i> ) ▲	21 mg†
Blue Vervain herb ( <i>Verbena hastata</i> ) ▲	18 mg†
Dandelion leaf & root ( <i>Taraxacum off.</i> ) ▲	12 mg†
St. John's Wort flower bud ( <i>Hypericum perforatum</i> ) ▲	12 mg†
Sage leaf ( <i>Salvia off.</i> ) ▲	12 mg†
†Daily Value not established.	

Other ingredients: Vegetable glycerin, lecithin, vegetable gelatin (capsule).

▲ = Certified Organic ● = Ecologically Wildcrafted

Each 3 capsules contain 3,000 mg crude herb equivalent.  
 Gaia Herbs Liquid Phyto-Caps™ Patent pending.

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 Best by

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